

SITE ENTRY - AVAILABILITY OF RECORDS

Y/N N/A RMK¹

1. As specified in Condition A.11, has the Permittee allowed the Director or an authorized representative, upon proper identification and upon stating the purpose and necessity of an inspection, to:

- (a) Enter at reasonable times upon the premises where a regulated activity is located or where records are kept under the conditions of the permit?
- (b) Have access to and copy any records required to be kept under the conditions of the permit?
- (c) Inspect facilities, equipment (including control and monitoring equipment), practices or other operations regulated under the conditions of the permit?
- (d) Sample or monitor any substance or parameter at any location of the facility to assure compliance with the permit or as otherwise authorized by R.C. Chapter 3734 and the rules adopted thereunder?

Y

Y

Y

NA

REMARKS

RECORDKEEPING REQUIREMENTS

CONFIDENTIALITY

1. Has the Permittee requested confidentiality of any information of the permit in accordance with R.C. Chapter 3734 and the rules adopted thereunder? [Condition A.24.]

Y/N N/A RMK#

*Financial
information
no longer
confidential*

OPERATING RECORD

2. Is the Permittee maintaining a written operating record at the facility as set forth in O.A.C. Rules 3745-54-73 and 3745-54-74? [Condition B.18]
3. Is the Permittee maintaining, until closure is complete and certified, the following documents and amendments, revisions and modifications to these documents: [Condition A.27. (a)]
 - (a) Waste analysis plan in accordance with O.A.C. Rule 3745-54-13 and the conditions of the permit?
 - (b) Contingency plan in accordance with O.A.C. Rule 3745-54-53 and the conditions of the permit?
 - (c) Closure plan in accordance with O.A.C. Rule 3745-55-12 and the conditions of the permit?
 - (d) Cost estimate for facility closure in accordance with O.A.C. Rule 3745-55-42 and the conditions of the permit? (estimate only - adequacy of estimate will be evaluated by C.O. financial assurance personnel)
 - (e) Personnel Training plan and records required by O.A.C. Rule 3745-54-16 and the conditions of the permit?
 - (f) Operating record required by O.A.C. Rule 3745-54-73 and the conditions of the permit?
 - (g) Inspection schedules developed in accordance with O.A.C. Rules 3745-54-15 and O.A.C. Rule 3745-55-74 and the conditions of the permit?
4. Have any of the documents identified in Question #3 been revised as required by the permit? If so,
 - (a) Has the Permittee submitted to the Ohio EPA? [Condition A.27. (b)]

Y

Y

Y

Y

Y

Y

Y

Y

Y

Y

*on set of
records not
on site*

5. Is the Permittee maintaining copies of all inspection logs at the facility for a period of at least three years from date of inspection? [Condition A.27.(c)]

Y

ANNUAL REPORT REQUIREMENT

6. Is the Permittee complying with annual report requirements set forth in O.A.C. Rule 3745-54-75 and the additional report requirements set forth in O.A.C. Rule 3745-54-77 and the conditions of the permit? [Condition B.18(a)]

Y

SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS

7. In compliance with Condition A.12.(b) of the permit, do the Permittee's records of monitoring information specify the:

(a) Date(s), exact place(s), time(s) and method(s) of sampling or measurement?

Y

(b) Individual(s) who performed the sampling or measurement?

Y

(c) Date(s) analyses were performed?

Y

(d) Individual(s) who performed the analyses?

Y

(e) Analytical technique(s) or method(s) used?

N

(f) Results of such analyses?

Y

8. Have the methods used to obtain a representative sample of the wastes to be analyzed included the appropriate SW-846 method or an equivalent method specified in the approved waste analysis plan? [Condition A.12(a)]

Y

9. Is the Permittee retaining records of monitoring information as required by the permit for at least (3) years from the date of sampling, including:

(a) All calibration and maintenance records?

NA

(b) All original strip chart recordings for continuous monitoring instrumentation? [Condition A.13.(a)]

NA

Y/N N/A RMK#

10. Has Ohio EPA requested submittal of any reports of other information required by the conditions of the permit from the Permittee? If so,

N _____

(a) Have the submittals been signed and certified according to O.A.C. Rule 3745-50-42? [Condition A.23]

NA _____

WASTE MINIMIZATION REQUIREMENTS

11. Does the Permittee certify, at least once every year, that the facility has a program in place to reduce the volume and toxicity of hazardous wastes generated to the degree determined by the Permittee to be economically feasible and that the current method of treatment, storage and disposal minimizes the threat to human health and the environment? [Condition F.1.]

Y no longer
in production

REMARKS

OFF-SITE SHIPMENTS/MANIFEST REQUIREMENTS

	Y/N	N/A	RMK#
1. Is all hazardous waste transported to and from the facility by a properly registered transporter of hazardous waste in accordance with all applicable laws, rules and standards? [Condition A.15. (b)]	<u>Y</u>		<i>Chem Waste from Model City</i>
2. Is the Permittee complying with the following manifest requirements set forth in O.A.C. Chapter 3745-52 and O.A.C. Rules 3745-54-70, 3745-54-71, 3745-54-72 and 3745-54-76: [Condition B.17.]			
(a) All hazardous wastes shipped off-site have been accompanied by a completed manifest, USEPA form 8700-22 and, if necessary, USEPA form 8700-22A in compliance with O.A.C. Rule 3745-52-20 (A)?	<u>Y</u>		
(b) The manifest form used contains all information required by O.A.C. Rule 3745-52-20 and the minimum number of copies required by O.A.C. Rule 3745-52-22?	<u>Y</u>		
(c) The facility has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with O.A.C. Rule 3745-52-20 (C) (D) (E)?	<u>Y</u>		
(d) Prepared manifests have been signed by the facility and initial transporter in compliance with O.A.C. Rule 3745-52-23?	<u>Y</u>		
3. Does the Permittee prohibit the receipt of hazardous waste from off-site? [Condition B.2. (a)]	<u>N</u>		<i>permitted to receive waste from RMI met</i>

REMARKS

WASTE ANALYSIS/WASTE ANALYSIS PLAN

Y/N N/A RMK#

- | | | | |
|----|---|-----------|---|
| 1. | Does the Permittee have a detailed chemical and physical analysis of waste streams which contains all information which is necessary to properly treat, store or dispose of the waste in accordance with O.A.C. Chapters 3745-54 to 3745-57 and the terms and conditions of the permit? [O.A.C. Rule 3745-54-13(A) (1)] | <u>Y</u> | _____ |
| 2. | Is the Permittee following the procedures described in the approved waste analysis plan and the requirements of O.A.C. Rule 3745-54-13? [Condition B.3.] | <u>Y</u> | _____ |
| 3. | Has the facility undergone a change in a process or operation generating hazardous waste which would require a repeat of the waste analysis? If so, | <u>N</u> | _____ |
| | (a) Did the facility conduct a repeat waste analysis in accordance with O.A.C. Rule 3745-54-13(A) (3) (a)? | <u>NA</u> | _____ |
| 4. | Does the Permittee sample and analyze for pH when conducting sampling for EP toxic metals (arsenic, barium, cadmium, lead, chromium, mercury, selenium and silver)? [Condition B.3. (b)] | <u>Y</u> | _____ |
| 5. | Does the Permittee, throughout normal operation, conduct sufficient waste analysis to verify that the waste feed to the thermal treatment unit is within the physical and chemical composition specified in the permit and approved waste analysis plan? [Condition D.2.] | <u>Y</u> | _____ |
| 6. | Is the facility permitted to receive waste from off-site? If so, | <u>Y</u> | _____ |
| | (a) Does the Permittee inspect hazardous wastes received to determine if the waste matches the identification of the waste on the accompanying manifest? [3745-54-13(A) (4)] | <u>Y</u> | _____ |
| | (b) If the results of the inspection identified in 4(a) reveal that the waste received does not match the waste designated on the manifest, has the facility repeated the waste analysis as required by O.A.C. Rule 3745-54-13(A) (3) (b)? | <u>NA</u> | _____ |
| | | | <i>NA receive was produced at plant</i> |
| 7. | Is the Permittee sampling and analyzing off-site shipments of waste sodium for the same parameters as sodium waste generated on-site (prior to thermal treatment) [Condition B.3. (c)]? | <u>Y</u> | _____ |
| | | | <i>none received in last year</i> |

GENERAL INSPECTION REQUIREMENTS

	Y/N	N/A	RMK#
1. Is the Permittee following the procedures and schedules described Section F of the approved permit application and the following requirements of O.A.C. Rule 3745-54-15: [Condition B.5]	Y		
(a) Does the Permittee inspect the facility with such regularity as to identify problems resulting from deterioration, malfunctions, operator errors or discharges which may lead to a release of hazardous waste to the environment or a threat to human health? [O.A.C. Rule 3745-54-15 (A) (1) (2)]	Y		
(b) Has the Permittee developed and followed a written inspection schedule for inspecting; monitoring equipment safety equipment, emergency equipment, security devices and operating and structural equipment? [O.A.C. Rule 3745-54-15 (1)]	Y		
i. Is the schedule kept at the facility? [O.A.C. Rule 3745-54-15 (B) (2)]	Y		
ii. Does the schedule identify the types of problems which are to be looked for during the inspection? [O.A.C. Rule 3745-54-15 (B) (3)]	Y		
iii. Does the schedule include inspection of areas subject to spills (i.e. loading and unloading areas) daily when in use and according to other applicable regulations when not in use? [O.A.C. Rule 3745-54-15 (B) (4)]	Y		
2. Does the Permittee remedy deterioration or any malfunctions discovered by an inspection, as required by O.A.C. Rule 3745-54-15 (C)? [Condition B.5.]	Y		
3. Is the Permittee maintaining records of inspections as required by O.A.C. Rule 3745-54-15 (D)? [Condition B.5]	Y		

REMARKS

SECURITY PROVISIONS

- | | Y/N | N/A | RMK# |
|---|----------|-----|------|
| 1. Is the Permittee complying with the security provisions of the approved application and the following requirements of O.A.C. Rule 3745-54-14 and Condition B.4. of the permit: | <u>Y</u> | | |
| (a) Does the Permittee have a 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility, or; | <u>Y</u> | | |
| (b) An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility, or; | <u>Y</u> | | |
| (c) A means to control entry, at all times, through gates or other entrances, to the active portion of the facility? | <u>Y</u> | | |
| 2. In accordance with O.A.C. Rule 3745-54-14(C), does the Permittee have signs reading "Danger-Unauthorized Personnel Keep Out" posted at each entrance and at other locations and in sufficient numbers to be seen when approaching the active portion of the facility? [Condition B.4.] | <u>Y</u> | | |

FACILITY OPERATION

- | | | | |
|--|----------|--|--|
| 3. Is construction, maintenance and operation of the facility being conducted to minimize the possibility of a fire, explosion, or unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil ground or surface waters? [Condition B.1.] | <u>Y</u> | | |
|--|----------|--|--|

REMARKS

PERSONNEL TRAINING

Y/N N/A RMK#

1. Is the facility conducting personnel training in accordance with Section H of the approved permit application and the following requirements of O.A.C. Rule 3745-54-16:
[Condition B.6.]

Y
over a year

- (a) The facility provides personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan?
[O.A.C. Rule 3745-54-16 (A) (B) (C)]

Y

- (b) The facility provides personnel training to new employees within 6 months after date of employment as required by O.A.C. Rule 3745-54-16 (B) ?

Y

- (c) The facility provides an annual refresher training course as required by O.A.C. Rule 3745-54-16 (B) ?

Y
over a year

2. Is the Permittee maintaining personnel training records as required by O.A.C. Rule 3745-54-16 (D) and of the approved application, including; written job titles, job descriptions and documented employee training records? [Condition B.6.]

Y
for specific Contingency

REMARKS

REQUIRED EQUIPMENT

Y/N N/A RMK#

1. Is the Permittee, at a minimum, maintaining at the facility the equipment set forth in Sections G of the approved permit application? [Condition B.8.] Y _____
2. Is the Permittee inspecting, testing and maintaining the equipment specified in Question #1 to assure its proper operation as specified in O.A.C. Rule 3745-54-33, the inspection plans and Section G of the approved permit application? [Condition B.9.] Y _____
3. Whenever hazardous waste is being managed at the facility, has the Permittee provided all personnel involved in the operation with immediate access to an internal alarm or emergency communication device as required by O.A.C. Rule 3745-54-34 and Section G of the approved permit application? [Condition B.10] Y _____

REQUIRED AISLE SPACE

4. Is the Permittee maintaining aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination in the event of an emergency to any area of the facility as required by O.A.C. Rule 3745-54-35? NA _____

no drums

REMARKS

CONTINGENCY PLAN - EMERGENCY PROCEDURES

	Y/N	N/A	RMK#
1. In compliance with Condition B.10 of the permit, does the Permittee familiarize the emergency response agencies listed on page 155 in the approved contingency plan, any haz-mat teams responding to emergencies at the facility with:			
(a) The layout of the facility;	<u>Y</u>		
(b) Properties of hazardous waste managed at the facility and associated hazards;	<u>Y</u>		
(c) Places where facility personnel will normally be working;	<u>Y</u>		
(d) Entrances to and road inside the facility; and	<u>Y</u>		
(e) Possible evacuation routes?	<u>Y</u>		

NOTE: The emergency agencies listed at page 155 in the approved contingency plan include:

- City of Ashtabula Fire Department;
- Ashtabula Township Fire Department;
- State Highway Patrol - Ashtabula Post;
- Sheriff's Department - Jefferson;
- Ashtabula County Medical Center, and;
- Emergency Management Agency - Jefferson.

2. Did the Permittee inform all agencies listed on page 155 of the approved plan of safety equipment, supplies, and proper safety procedures that are applicable to the facility, and any further requirements imposed by the conditions of the permit? [Condition B.10.]	<u>Y</u>	<i>need to send new em. coord. list</i>	
3. Did the Permittee familiarize Ashtabula County Medical Center with the properties of the hazardous waste managed at the facility and the types of injuries or illness which could result from fires, explosions, or releases of hazardous wastes? [Condition B.10.]	<u>Y</u>		
4. Has a state or local agency declined to enter into the arrangements set forth in O.A.C. Rule 3745-54-37(A)? If so,	<u>N</u>		
(a) Has the Permittee documented the refusal in the operating record as required by O.A.C. Rule 3745-54-37(B)? [Condition B.10.(b)]	<u>NA</u>		

Y/N N/A RMK#

5. Has the Permittee, in accordance with O.A.C. Rule 3745-54-53 submitted a copy of the approved contingency plan (including amendments, revisions or changes) to all local authorities, agencies and response contractors designated in the approved contingency plan? [Condition B.10.(c)]

Y —

6. Has the Permittee notified the agencies in Question #1, in writing, within (10) days of the effective date of any amendments or revisions to the plan? [Condition B.10.(c)]

Y —

7. Is the Permittee reviewing the approved contingency plan regularly and amending the plan immediately if needed in compliance with O.A.C. Rule 3745-54-54?

Y —

EMERGENCY COORDINATOR

8. In accordance with O.A.C. Rule 3745-54-55 and Condition B.15., is an emergency coordinator on premises or on call at all times?

Y —

9. In accordance with O.A.C. Rule 3745-54-55 and Condition B.15. of the permit, is/are the emergency coordinator(s) at the facility familiar with the following:

(a) Contingency plan?

Y —

(b) Facility operations/activities

Y —

(c) Waste characterization and locations

Y —

(d) Facility layout?

Y —

10. In accordance with O.A.C. Rule 3745-55-43 and Condition B.15. of the permit, does/do the emergency coordinator(s) have the authority to commit the resources needed to carry out the contingency plan?

Y —

IMPLEMENTATION OF CONTINGENCY PLAN

11. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents at the facility since date of last inspection? If so,

N —

(a) Did the Permittee immediately implement the approved Contingency Plan and follow the emergency procedures described in O.A.C. Rule 3745-54-56? [Condition B.11] and;

NA —

Y/N N/A RMK#

(b) Did the Permittee collect and manage released material, emergency response material and by-products as hazardous waste until making a demonstration to Ohio EPA that such materials are subject to Ohio hazardous waste rules? [Condition B.13]

NA _____

(c) Within (15) days of the incident, did the Permittee submit to the Director, a written report of the incident? If so,

NA _____

i. Did the report contain the elements set forth in O.A.C. Rule 3745-54-56(J)? [Condition B.16. (a)]

NA _____

(d) Did the Permittee note in the operating record the time, date and details of any incident that required implementation of the approved contingency plan? [Condition B.16. (a)]

NA _____

REMARKS

CLOSURE REQUIREMENTS

Y/N N/A RMK#

1. Is the Permittee maintaining at the facility, a closure plan which contains the elements set forth in O.A.C. Rule 3745-55-12? [Condition B.21.(a)]

Y — —

2. Is the Permittee keeping at the facility, the latest closure cost estimate as required by O.A.C. Rule 3745-55-42(D)? [Condition B.26.(c)]

Y — —

3. Has the Permittee amended the closure plan?

Y *in new permit application* —

(a) If so, has the plan been amended in accordance with O.A.C. Rule 3745-55-12(C)? [Condition B.21.(b)]

Y — —

4. Has the Permittee closed the facility? If so,

N — —

(a) Was closure conducted in accordance with the closure performance standard of O.A.C. Rule 3745-55-11? [Condition B.19.]

NA — —

(b) Did the Permittee carry out the approved closure plan as set forth in the permit application and the condition of the permit? [Condition B.20.]

NA — —

(c) After receiving the final volume of hazardous waste, did the Permittee remove from the facility all hazardous waste and complete closure activities in accordance with the schedule specified in the approved closure plan and as required by O.A.C. Rule 3745-55-13? [Condition B.23.]

NA — —

(d) Has the Permittee decontaminated and/or disposed of all facility equipment as required by O.A.C. Rule 3745-55-14 and the approved closure plan? [Condition B.24]

NA — —

(e) Has the Permittee certified that the facility has been closed in accordance with the specifications in the approved closure plan as required by O.A.C. Rule 3745-55-15? [Condition B.25.]

NA — —

REMARKS

FINANCIAL ASSURANCE REQUIREMENTS

NOTE: An evaluation of compliance with the following permit conditions applicable to financial assurance and closure cost update is not encompassed in this inspection and is to be evaluated by Ohio EPA, Central Office financial assurance personnel at a later date.

	Y/N	N/A	RMK#
1. Is the Permittee demonstrating compliance with O.A.C. Rules 3745-55-43 and 3745-55-46, by providing documentation of financial assurance, as required by Condition B.27. of the permit?	Y		
2. Is the Permittee demonstrating compliance with the financial assurance requirements of O.A.C. 3745-55-47 and the documentation requirements of O.A.C. Rule 3745-55-51? [Condition B.27.]	Y		
3. Is the Permittee in compliance with O.A.C. Rule 3745-55-48? [Condition B.30]	Y		
4. Has the Permittee submitted the properly identified documents, listed below, to the Ohio EPA within (90) days after the journalization of the permit [Condition A.26.]:			
(a) An updated and remediated financial assurance mechanism for closure in accordance with O.A.C. Rule 3745-55-43, and worded as specified in O.A.C. Rule 3745-55-51?	Y		
(b) An updated and remediated financial assurance mechanism for liability insurance, in accordance with O.A.C. Rule 3745-55-47 and worded as specified in O.A.C. Rule 3745-55-51?	Y		
(c) An updated estimate for closure in accordance with O.A.C. Rule 3745-55-42?	Y		

REMARKS

REQUIREMENTS FOR IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES

	Y/N	N/A	RMK#
1. Does the Permittee separate ignitable and/or reactive wastes and protect each from sources of ignition or reaction in accordance with O.A.C. Rule 3745-54-17? [Condition B.7. (a)]	<u>NA</u>		<u>no waste</u>
2. Does the Permittee confine smoking and open flames to designated areas when ignitable or reactive wastes are being handled as required by O.A.C. Rule 3745-54-17(A)? [Condition B.7. (a)]	<u>NA</u>		<u> </u>
3. Are "No Smoking" signs placed where there is a hazard from ignitable or reactive wastes as required by O.A.C. Rule 3745-54-17? [Condition B.7. (a)]	<u>NA</u>		<u> </u>
4. Does the Permittee prevent the commingling of sodium/calcium sludge or items containing sodium/calcium sludge with any other material or place them where they may be commingled with any other material? [Condition B.7. (b)]	<u>Y</u>		<u> </u>
5. Does the Permittee follow the procedures set forth in Response to HWFB Request #11 (attached as Appendix A) to prevent the reaction of sodium/calcium sludge or its commingling with incompatible materials? [Condition B.7. (b)]	<u>Y</u>		<u> </u>
6. Does the Permittee at all times maintain diking around tanks storing sulfuric acid located in areas where a spill may be washed into the waste pile? [Condition B.7. (c)]	<u>Y</u>		<u> </u>
7. Is the diking area noted in Question #6 of sufficient dimension to contain the volume of the largest tank within its boundary? [Condition B.7. (c)]	<u>Y</u>		<u> </u>

REMARKS

STORAGE IN WASTE FILES

	Y/N	N/A	RMK#
1. Is the Permittee storing only D005, D006 and D008 hazardous wastes in the waste pile? [Condition C.1. (a)]	<u>Y</u>		<i>only D005</i>
2. Does the Permittee limit the annual quantities of wastes stored in the pile to no more than 3,000,000 lbs/year as specified in Condition C.1. (a) of the permit?	<u>Y</u>		
3. Does the design capacity of the waste pile exceed no more than 40 cubic yards? [Condition C.1. (b)]	<u>Y</u>		
4. Is the waste stored in the pile limited exclusively to cell bath wastes generated on-site during the operation and maintenance of the Downs Cell Process? [Condition C.1. (c)]	<u>Y</u>		
5. Does the Permittee prohibit the management of wastes generated from off-site in the waste pile? [Condition C.1. (c)]	<u>Y</u>		
6. Is the construction, operation and maintenance of the waste pile as specified in Condition H and Section D of the approved application conducted in a manner which ensures that:			
(a) Liquids or materials containing free liquids are not placed in the pile? [Condition C.2. (a)]	<u>Y</u>		
(b) The pile is protected from surface water run-on? [Condition C.2. (b)]	<u>Y</u>		
(c) The pile is designed and operated to control dispersal of the waste by wind, where necessary, by means other than wetting? [Condition C.2. (c) and C.3. (h)]	<u>Y</u>		
(d) Decomposition or other reactions do not occur? [Condition C.2. (d)]	<u>Y</u>		
(e) The pile will not be closed with waste left in place? [Condition C.2. (e)]?	<u>Y</u>		<i>now empty - ready for closure</i>
(f) The pile is placed on a base, which is approved by the Director for its intended use? [Condition C.2. (f)]	<u>Y</u>		
(g) The pile (including its underlying base) is located entirely above the seasonal high water table? [Condition C.2. (g)]	<u>Y</u>		

7. Is the Permittee inspecting the waste pile in accordance with the requirements of O.A.C. Rules 3745-56-53 and 3745-56-54 and the following [Condition C.3.]:

- (a) The pile is inspected daily when in use? [Condition C.3.(a)]
- (b) Waste pile inspections include the area at the top of the chute? [Condition C.3.(b)]
- (c) Cell bath spillage at the top of the chute is cleaned immediately? [Condition C.3.(c)]
- (d) Cell bath waste at no time remains outside the waste pile? [Condition C.3.(d)]
- (e) Spill clean equipment is maintained at locations designated in the approved contingency plan? [Condition C.3.(e)]
- (f) The pile is inspected when in use or daily (whichever is more frequent) for accumulated liquids extending beyond the waste pile and any liquids found are immediately absorbed and added to the waste pile? [Condition C.3.(i)]

Y
Y
Y
Y
Y
Y

not used since last fall, will no longer be used

8. Within sixty (60) days after permit journalization, did the Permittee:

- (a) Complete closure of the back (chute) portion of the pile? [Condition C.3.(g) (i)]
- (b) Install simple gutters or a "drip rail" at the base of the "drop chute" which extends from the second floor of the production building to the pile, or install any other means to prevent precipitation or blowing snow coming in contact with the waste and to prevent wind dispersal? [Condition C.3.(g) (ii)]

* (is this the 8/6/90 closure?)

9. Does the Permittee annually remove all waste from the waste pile structure and "broom clean" so that the floor can be thoroughly inspected for corrosion and leaks? [Condition C.3.(j)]

Y

10. Does the Permittee prohibit the management of ignitable wastes in the waste pile? [Condition C.4.]

Y

* I am confused by the issue of a 8/6/90 closure. This maybe the closure referred to.

Y/N N/A RMK#

11. Does the Permittee prohibit the storage of waste in the pile which, when commingled, may product heat or pressure, fire or explosion, violent reaction, or toxic or flammable dusts, fumes or gases? [Condition C.5. (a)] Y _____
12. Does the Permittee prohibit the management of oxidizing agents in the waste pile? [Condition C.5. (b)]? Y _____

REMARKS

STORAGE IN CONTAINERS

Y/N N/A RMK#

1. Is the Permittee storing, in containers, only the following wastes? [Condition E.1.(a)]

EPA HAZARDOUS
WASTE NO.

ANNUAL QUANTITY
OF WASTE

D003

3,600 lbs/year

*No waste
NA Stored
since 2/92*

2. Does the Permittee limit the annual quantities of wastes stored in containers as specified in Question #1 to 3,600 lbs/year? [Condition E.1.(a)]
3. Does the Permittee maintain a maximum capacity for container storage of no greater than 660 gallons? [Condition E.1.(b)]

NA

NA

CONTAINER MANAGEMENT

4. Are all containers holding hazardous waste in good condition? [Condition E.2.]

NA

- (a) If not, did the Permittee transfer the hazardous waste to a container that was in good condition or manage the waste in some other manner that complies with the requirements of the Ohio hazardous waste rules? [Condition E.2.]

NA

5. Is the Permittee using containers made of or lined with, materials which will not react with the hazardous waste to be stored? [Condition E.3]
6. Are containers holding hazardous waste always kept closed during storage, except when it is necessary to add or remove waste? [Condition E.4.(a)]
7. Are containers holding hazardous waste being opened, handled, or stored in a manner which may rupture the container or cause it to leak? [Condition E.4.(b)]
8. At least weekly, is the Permittee inspecting areas where containers are stored, looking for leaking containers and for deterioration of containers and the containment system* caused by corrosion or other factors? [Condition E.5.]

NA

NA

NA

Y

** no containment - solid*

CONTAINMENT SYSTEM REQUIREMENTS

Y/N N/A RMK#

9. Does the container storage area have a containment system is designed and operated in accordance with O.A.C. rule 3745-55-75(B), except as provided by paragraph (C) of that rule? [Condition E.6.]

*physically
solid
waste*
NA

IGNITABLE/REACTIVE/INCOMPATIBLE WASTE

10. Are containers holding ignitable or reactive waste located at least 15 meters (50 feet) from the facility's property line? [Condition E.7.]
11. Are incompatible wastes placed in the same containers? If so,

Is the Permittee in compliance with O.A.C. rule 3745-54-17(B)?
(See Ignitable/Reactive/Incompatible Waste Requirements section of checklist)? [Condition E.8.(a)]
12. Are hazardous wastes placed in an unwashed container that previously held an incompatible waste or material?
[Condition E.8.(b)]
13. Are storage containers holding incompatible hazardous wastes separated from the other materials or protected from them by means of a dike, berm, wall, or other device? [Condition E.8.(c)]

Y

N

NA

*dedicated
drums*
N

NA

CLOSURE

14. At closure, have all hazardous waste and hazardous waste residues been removed from the containment system and have remaining containers, liners, bases and soil containing or contaminated with hazardous waste or hazardous waste residues been decontaminated or removed? [Condition E.9.]

NA

REMARKS

THERMAL TREATMENT REQUIREMENTS

Y/N N/A RMK#

WASTE IDENTIFICATION

1. Is the Permittee thermally treating only the following wastes as specified in the permit and in compliance with the annual allowable quantities [Condition D.1.(a)]:

EPA WASTE	DESCRIPTION	ANNUAL QUANTITY OF WASTE		
D003	Sodium/calcium sludge from sodium cell parts	22,000 lbs/yr	<u>Y</u>	—
D003	Waste sodium from RMI-MRP tank car spoolpiece	1,200 lbs/yr	<u>Y</u>	—
D003	Waste sodium from RMI-MRP sinter pot spoolpiece	2,400 lbs/yr	<u>Y</u>	—
			<u>Y</u>	—
	NOT TO EXCEED:	30,000 lbs/yr	—	—

NOTES: While the individual annual quantities of wastes are approximations, the TOTAL annual quantity of waste to be thermally treated SHALL NOT EXCEED 30,000 pounds.

2. Does the Permittee maintain a maximum design capacity of the thermal treatment unit of 1,700 lbs/day? [Condition D.1.(c)] Y —
3. Is D003 waste only present in the combustion zone during thermal treatment? [Condition D.1.(c)] Y —
4. Is waste thermally treated managed in a manner as set forth in the applicant's Response to the Board's Order Requiring Responses and Authorizing Comments, with accompany Attachment I (See Appendix B of permit)? [Condition D.1.(c)] Y —
5. Does sodium/calcium sludge contain no greater than 150 ppm of barium prior to thermal treatment? [Condition D.1.(d)] Y Be at detection
6. Does the Permittee conduct annual waste analysis to ensure that wastes treated contain no more than 150 ppm of barium? [Condition D.1.(d)] Y —

7. Within 60 days after permit journalization, or the installation of a high energy Venturi Scrubber (whichever is later), did the Permittee submit to the Ohio EPA:

(a) Results of emission tests? [Condition D.1.(e)]

Y

(b) A demonstration that the off-site ambient time-weighted average levels (as defined by the American Conference of Governmental Industrial Hygienists) of NaOH, CaOH, and CaO do not exceed 2.0, 5.0 and 2.0 mg/m³, respectively? [Condition D.1.(e)]

Y

(c) Does the demonstration identified in 6(b) above also confirm that the ambient level for NaOH does not exceed 2.0 mg/m³ at any given time? [Condition D.1.(e)]

Y

8. Does the Permittee monitor the stack plum at least hourly when the thermal treatment unit is in operation in accordance with O.A.C. Rule 3745-68-77(B)? [Condition D.3.]

Y

9. Does the Permittee inspect the complete thermal treatment unit daily when in operation for leaks, spills and fugitive emissions in accordance with O.A.C. Rule 3745-68-77(C)? [Condition D.4.]

Y

END OF PERMIT CONDITIONS

REMARKS

15012
1001 334
1011K A110

OAC CHAPTER 3745-59 - LDR GENERAL REQUIREMENTS

CASE-BY-CASE EXTENSIONS

Y/N/NA RMK#

1. Has the entity received an extension for compliance with land disposal restrictions from US EPA pursuant to 40 CFR 268.5? If yes, _____

(a) List the waste(s) affected: _____

(b) Has the extension been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-05(C)] _____

(c) When does the extension expire? _____

NOTE: A case-by-case extension can be granted for up to one year. The extension is renewable once (by US EPA) for an additional year. Until receiving approval of the extension by US EPA and recognition of the extension by the Director of Ohio EPA, the entity must continue to manage the waste in accordance with all applicable LDR requirements.

VARIANCE FROM A TREATMENT STANDARD

2. Has the entity been granted a variance from a treatment standard by US EPA pursuant to 40 CFR 268.44? If yes, _____

(a) List the waste(s) affected: _____

*Did sent Ba contaminated both debris
under variance*

(b) Has the variance been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-44(C)] _____

NOTE: Until the variance has been approved by US EPA and recognized by the Director of Ohio EPA, the entity must continue to manage the waste in compliance with the LDR requirements.

NOTIFICATION/CERTIFICATION

Y/N/NA

RMK#

6. For wastes that do not meet treatment standards: Does the generator notify the treatment/storage facility receiving the wastes, in writing, that wastes being received do not meet treatment standards? [O.A.C. Rule 3745-59-07(A) (1); 40 CFR 268.7(a) (1)]

Y

If so, does the notification include the following:

- (a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A) (1) (a); 40 CFR 268.7(a) (1) (i)]
- (b) Appropriate treatment standard for the waste? [O.A.C. Rule 3745-59-07(A) (1) (b); 40 CFR 268.7(a) (1) (ii)]
- (c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A) (1) (c); 40 CFR 268.7(a) (i) (iii)]
- (d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A) (1) (d); 40 CFR 268.7(a) (1) (iv)]

YYYY

7. Is the notification identified in Question #6 submitted with each shipment of waste? [O.A.C. Rule 3745-59-07(A) (1); 40 CFR 268.7(a) (1)]

Y

8. For wastes that meet treatment standards: Does the generator submit a written notice and certification to the treatment, storage or disposal facility receiving the wastes stating wastes being received meet applicable treatment standards? [O.A.C. Rule 3745-59-07(A) (2); 40 CFR 268.7(a) (2)]

NA

If so, does the notice/certification include the following:

- (a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A) (2) (a) (i); 40 CFR 268.7(a) (2) (i) (A)]
- (b) The corresponding treatment standards and applicable prohibitions for the waste? [O.A.C. Rule 3745-59-07(A) (2) (a) (ii); 40 CFR 268.7(a) (2) (i) (B)]
- (c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A) (2) (a) (iii); 40 CFR 268.7(a) (2) (i) (C)]
- (d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A) (2) (a) (iv); 40 CFR 268.7(a) (2) (i) (D)]
- (e) Is the certification signed by the generator or an authorized representative? [O.A.C. Rule 3745-59-07(A) (2) (b); 40 CFR 268.7(a) (2) (ii)]

Y

9. Is the notification/certification identified in Question #8 submitted with each shipment of waste? [O.A.C. 3745-59-07 (A) (2); 40 CFR 268.7(a) (2)]
10. **For wastes subject to a case-by-case extension, exemption or a variance:** Does the generator provide written notice to the facility receiving the waste that the waste is not prohibited from land disposal? [O.A.C. Rule 3745-59-07 (A) (3); 40 CFR 268.7(a) (3)]
- If so, does the notice contain the following information:
- (a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07 (A) (3) (a); 40 CFR 268.7(a) (3) (i)]
 - (b) The corresponding treatment standard and applicable prohibitions? [O.A.C. Rule 3745-59-07(A) (3) (b); 40 CFR 268.7(a) (3) (ii)]
 - (c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A) (3) (c); 40 CFR 268.7(a) (3) (iii)]
 - (d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A) (3) (d); 40 CFR 268.6(a) (3) (iv)]
 - (e) The date the waste is subject to the prohibitions? [O.A.C. Rule 3745-59-07(A) (3) (e); 40 CFR 268.7(a) (3) (v)]
11. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least five years? [O.A.C. Rule 3745-59-07(A) (6); 40 CFR 268.7(a) (7)]

NA

NA

REMARKS

LDR - TREATMENT FACILITY REQUIREMENTS

REQUIRED TREATMENT

Y/N/NA

RMK#

1. Does the facility treat any restricted wastes for which a specified technology (or technologies) has/have been established as the LDR treatment standard?

(a) If so, is the facility using the appropriate technology as required by O.A.C. Rule 3745-59-42 (40 CFR 268.42)?

(b) If not, has US EPA granted the facility approval to use an alternative treatment method other than the required technology? [O.A.C. Rule 3745-59-42(B); 40 CFR 268.42(b)]

2. Does the facility treat restricted wastes for which a concentration level has been established as the LDR treatment standard?

If so, does the treatment facility test its waste treatment residues according to the following requirements:

(a) For wastes with treatment standards expressed as a concentration in the waste extract (a CCWE standard found in O.A.C. Rule 3745-59-41; 40 CFR 268.41):

Following treatment, does the treatment facility test the treatment residues or an extract of such residues using the TCLP test to assure that the residues or extract meet the applicable treatment standard? [O.A.C. Rule 3745-59-07(B) (1); 40 CFR 268.7(b) (1)]

(b) For wastes with treatment standards expressed as concentrations in the waste (a CCW standard found in Rule 3745-59-43; 40 CFR 268.43):

Does the treatment facility test treatment residues (not an extract of such residues) using a total constituent analysis to assure that the residues meet applicable treatment standards? [O.A.C. Rule 3745-59-07(B) (3); 40 CFR 268.7(b) (3)]

3. Does the treatment facility combine waste streams together for the purposes of treatment which have a concentration based LDR treatment standard for the same constituent(s)?

(a) If so, does the treatment facility ensure that the more stringent standard for the mixture is met? [O.A.C. Rule 3745-59-41(B) and 3745-59-43(B); 40 CFR 268.41(b) and 268.43(b)]

OFF-SITE SHIPMENTS - NOTIFICATION/CERTIFICATION REQS.

Y/N/NA RMK#

4. For all restricted wastes: Does the treatment facility have hazardous waste and/or treatment residues shipped off-site for land disposal?

N

If so, does the treatment facility provide the land disposal facility with a written notice containing the following:

- (a) EPA hazardous waste number? [3745-59-07(B) (4) (a); 40 CFR 268.7(b) (4) (i)]
- (b) The corresponding treatment standards and applicable prohibitions for each waste? [3745-59-07(B) (4) (b); 40 CFR 268.7(b) (4) (ii)]
- (c) The manifest number associated with the shipment of waste? [3745-59-07(B) (4) (c); 40 CFR 268.7(b) (4) (iii)]
- (d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(B) (4) (d); 40 CFR 268.7(b) (4) (iv)]

NA

NA

NA

NA

5. Does the facility have any wastes and/or treatment residues shipped off-site for disposal which have been generated from treatment of a restricted waste to meet treatment standards? If so,

N

For wastes and/or treatment residues generated from the treatment of a waste which has a **concentration based** treatment standard:

- (a) Does the treatment facility also submit a written certification with each shipment of waste or treatment residue stating that the waste has been treated in compliance with applicable treatment standards? [O.A.C. Rule 3745-59-07(B) (5); 40 CFR 268.7(b) (5)]
- (b) Does the certification contain the language as required by O.A.C. Rule 3745-59-07(B) (5) (a) (40 CFR 268.7(b) (5) (i))?

NA

NA

For wastes and/or treatment residues generated from the treatment of a waste which has a **technology based** treatment standard:

- (c) With each shipment of treatment residue shipped off-site for disposal, does the treatment facility submit a certification stating that the waste has been treated in accordance with the appropriate treatment technology as specified in O.A.C. Rule 3745-59-42 (40 CFR 268.42)? [O.A.C. Rule 3745-59-07(B) (5); 40 CFR 268.7(b) (5)]

NA

(d) Is the certification signed by an authorized representative and does it contain the language as specified in O.A.C. Rule 3745-59-07(B) (5) (b) (40 CFR 268.7(b) (5) (ii)?

NA

6. Does the treatment facility have wastes shipped off-site that do not meet treatment standards and/or wastes that must be further managed at a different treatment or storage facility? If so,

N

(a) Is the facility complying with the generator notification requirements? [O.A.C. Rule 3745-59-07(B) (6); 40 CFR 268.7(b) (6)]

NA

TREATMENT OF CHARACTERISTIC HAZARDOUS WASTE

7. Does the facility treat characteristic hazardous waste(s) to render such waste(s) non-hazardous?

Y

(a) If so, are treated waste(s) sent to a licensed solid waste disposal facility?

N

once treated
goes to
WWTP
on site

i. If so, with each shipment of waste, does the generator submit a notification/certification to the Regional Administrator/Director which contains the following:

a. Name and address of the facility receiving the waste? [O.A.C. Rule 3745-59-09(D) (1) (a); 40 CFR 268.9(d) (1) (i)]

NA

b. A description of the waste as initially generated, including EPA hazardous waste numbers and treatability group? [O.A.C. Rule 3745-59-09(D) (1) (b); 40 CFR 268.9(d) (1) (ii)]

NA

c. The treatment standards applicable to the waste at the initial point of generation? [O.A.C. Rule 3745-59-09(D) (1) (c); 40 CFR 268.9(d) (1) (iii)]

NA

ii. Is the certification signed by an authorized representative and does it contain the language in O.A.C. Rule 3745-59-07(B) (5) (a) (40 CFR 268.7(b) (5) (i)? [O.A.C. Rule 3745-59-09(D) (2); 40 CFR 268.9(d) (2)]

NA

NOTE: Please see the waste analysis/waste analysis plan portion of the CEI checklist for additional questions regarding LDR requirements.

LDR - LAND DISPOSAL FACILITY REQUIREMENTS

Y/N/NA RMK#

1. Does the land disposal facility retain copies of LDR notices and certifications? . [O.A.C. Rule 3745-59-07(C) (1); 40 CFR 268.7(c) (1)] NA
2. Does the land disposal facility test the waste or an extract of the waste or treatment residue received in accordance with the the facility's waste analysis plan to ensure compliance with applicable LDR treatment standards, including: [O.A.C. Rule 3745-59-07(C) (2); 40 CFR 268.7(c) (2)]
 - (a) Conducting the TCLP to test waste/residues which have a CCWE concentration based treatment standard? [O.A.C. Rule 3745-59-07(C) (2); 40 CFR 268.7(c) (2)] NA
 - (b) Conducting a total constituent analysis to test waste/residues which have a CCW concentration based treatment standard? [O.A.C. Rule 3745-59-07(C) (2); 40 CFR 268.7(c) (2)] NA
 - (c) Is testing specified in 2(a) and 2(b) conducted in accordance with the frequency set forth in the facility's waste analysis plan? [O.A.C. Rule 3745-59-07(C) (2); 40 CFR 268.7(c) (2)] NA

NOTE: Analytical testing of residues which have been generated from treatment of a waste which has a technology based treatment standard only is not required.

3. Where applicable, does the land disposal facility ensure that only restricted wastes/residues which meet applicable concentration based treatment standards of O.A.C. rules 3745-59-41 or 3745-59-43 (268.41 or 268.43) are disposed of? [O.A.C. Rule 3745-59-40(A), (C); 40 CFR 268.40(a), (c)] NA
4. Where applicable, does the land disposal facility ensure that only restricted wastes/residues which have been treated using the specified technology of O.A.C. Rule 3745-59-42 (40 CFR 268.42) are disposed of? [O.A.C. Rule 3745-59-40(B); 40 CFR 268.40(b)] NA

NOTE: Please see the waste analysis/waste analysis plan portion of the CEI checklist for additional questions regarding LDR requirements.



P. O. BOX 269
1000 WARREN AVENUE
NILES, OHIO 44446-0269
FAX 216/544-7796

October 26, 1992

Adrienne LaFavre, Ph.D.
Environmental Specialist
Ohio Environmental Inspection Agency
Div. of Hazardous Waste Management
Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087-1969

Subject: August 1992 RCRA Inspection - RMI Sodium Plant
OHD 000 810 242

Dear Dr. LaFavre:

Enclosed are two copies of the response to your September 23, 1992 letter. I am pleased to be able to report that, as a result of a dedicated effort by the Sodium Plant management team and employees, RMI was able to correct the deficiencies noted concerning general inspection requirements, LDR requirements, notification/certification requirements, general waste analysis, accumulation, and labeling requirements. In addition, analysis of drummed material is ongoing for those materials addressed during the inspection.

The RMI Titanium Company announced plans on January 24, 1992 to cease production at the RMI Titanium Company - Sodium Plant (RMI-SP). The facility was a producer of pure metallic sodium and chlorine gas via the Downs electrolytic process. This cessation of production has severely disrupted the normal flow of activities at the facility as the plant has changed from a production mode to one of decommissioning.

In preparation for the decommissioning, the RMI-SP has requested a revision of the Part B Permit Application (January 29, 1992) to allow a treatment capacity increase for the thermal treatment unit. In addition, the facility has submitted an extensive revision to the Part B Permit (May 4, 1992) to address changes in the permit due to plant decommissioning.

Adrienne LaFavre, Ph.D.
OEPA
Aug. 1992 RCRA Inspection
RMI Sodium Plant
October 26, 1992
Page 2



The above mentioned comments are not meant to excuse the RMI-SP of any noncompliance issues noted during the OEPA inspections on August 17 and 18, 1992. They are to make clear the radical changes that have recently occurred at the facility prior to the inspections.

We would like to meet with you at your convenience as soon as you have reviewed the enclosed response. Please contact me to set up a meeting or with any questions at 216/544-7688.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard L. Mason", written over a horizontal line.

Richard L. Mason
Director
Environmental Affairs

sim

enclosures

cc: D. P. Korb
W. J. McCarthy
D. R. Micsky

RMI TITANIUM COMPANY

SODIUM PLANT

ASHTABULA, OHIO

RESPONSE TO

OHIO EPA RCRA LETTER

OF SEPTEMBER 23, 1992

October 23, 1992

RMI GENERAL COMMENTS

The RMI Titanium Company announced plans on January 24, 1992 to cease production at the RMI Titanium Company - Sodium Plant (RMI-SP). The facility was a producer of pure metallic sodium and chlorine gas via the Downs electrolytic process. This cessation of production has severely disrupted the normal flow of activities at the facility as the plant has changed from a production mode to one of decommissioning.

In preparation for the decommissioning the RMI-SP has requested a revision of the Part B Permit Application (January 29, 1992) to allow a treatment capacity increase for the thermal treatment unit. In addition the facility has submitted an extensive revision to the Part B permit (May 4, 1992) to address changes in the permit due to plant decommissioning.

The above mentioned comments are not meant to excuse the RMI-SP of any noncompliance issues noted during the OEPA inspections on August 17 and 18, 1992. They are to make clear the radical changes that have recently occurred at the facility prior to the inspections.

DESCRIPTION OF VIOLATIONS

1) General Inspection Requirements

1-A OEPA COMMENT: Time of inspection is not always noted, inspections of all permitted units must continue even during periods of nonuse, any problem with a permitted unit should be

noted along with the corrective action taken.

RMI RESPONSE: Immediately following the August 1992 OEPA inspection the RMI-SP Plant Manager met formally with the plant foreman who is now responsible for the inspections of the permitted units. On October 22, 1992 a formal training session was held with all involved RMI-SP personnel. The training reviewed the proper procedures for conducting and recording inspections of permitted units at the facility. See attachment #1

1-B OEPA COMMENT: Based on the inspection forms presently used, it is not easy to determine whether the drum storage area is being inspected.

RMI RESPONSE: The Hazardous Waste Burning Room Inspection Form (See attachment #2) addresses the drum storage area in four inspection items on the form. These items are:

- Item 1. Adequate Aisle Space
- Item 2. Burning Room and Storage Area
- Item 3. Unacceptable Material
- Item 4. Condition of Containers & Pallets

RMI-SP will clarify these four inspection items (See attachment #3) with the following modifications to the form:

- Item 1. Adequate Aisle Space in Drum Storage Area
- Item 2. Burning Room and Drum Storage Area
- Item 3. No modification
- Item 4. Condition of Containers and Pallets in Drum Storage Area

2) LDR Generator Requirements

2-A OEPA COMMENT: The Land Ban Form was missing for manifest 0074.

RMI RESPONSE: The Land Ban Form for manifest 0074 (State Manifest No. NYB4409316) was misfiled and could not be located. A

copy was obtained from the disposal company and is enclosed. See attachment #4.

3) Notification/Certification

3-A OEPA COMMENT: The appropriate treatment standard was missing from manifest 0001.

RMI RESPONSE: On 10/22/92, a review training class was held with all involved RMI-SP personnel. The review class addressed the proper completion of Land Ban Forms. See attachment #1

4) General Waste Analysis

4-A OEPA COMMENT: During our inspection we found unlabelled drums in several locations.

RMI RESPONSE: While RMI-SP agrees that the proper identification of drummed material is important, the unlabelled drums are not a violation of OAC 3745-65-13 which applies to hazardous waste. RMI-SP has inspected this list of drums as to their content. The drum contents have been identified either through process knowledge or analytical testing.

4-1 OEPA COMMENT: one 55 gal. drum which had been used as a parts washer.

RMI RESPONSE: This parts washer, located in the maintenance shop is actually a 20 gallon drum cut in half lengthwise and placed on a horizontal stand. The solvent used in the unit was a product called "Parts Klean Solvent" from State Chemical Manufacturing Company. Parts Klean Solvent is a non-hazardous solvent as listed on the Material Safety Data Sheet. See attachment #5. The unit has

been cleaned of the approximately 2 lbs. of sludge and the sludge will be properly disposed. We apologize for not having this information readily available during the inspection.

4-2 OEPA COMMENT: twenty-three 55 gal. unlabeled drums near area C.

RMI RESPONSE: The drums in this area are non-hazardous waste which are stored in this location prior to proper disposal. Following the inspection all drums in this area were collected. A total of twenty-nine drums were collected. The twenty-nine drums near area C have been inspected and the contents identified either through process knowledge or analytical testing.

The drum list includes:

2 Drums Floor Sweepings (clay absorbent, wood and iron debris)

As the area where these sweepings were generated could not be identified, and based on your concerns a composite sample was sent out for analysis 10/16/92.

2 Drums Grey Salt Material

As the area where this salt was generated could not be identified, and based on your concerns a composite sample was sent out for analysis 10/16/92.

4 Drums Salt Scrap

This material is non-hazardous waste salt (NaCl) from salt production. The material will be properly disposed.

1 Drum Oil Booms.

RMI-SP maintained a floating oil boom in certain ditches

as a precautionary measure in case of an oil spill. This drum contained weathered booms which had been discarded. The material will be properly disposed.

2 Drums Soil

During certain excavation activities (e.g. monitoring well installation) soil is temporarily drummed, pending laboratory analysis. As the source of this soil could not be identified, and based on your concerns a composite sample was sent out for analysis 10/16/92.

1 Drum Oil Absorbent Material. (Pads)

When operating RMI-SP used oil absorbent pads in various locations around machinery to absorb spilled oil. This drum contained several used pads which had been discarded. The material will be properly disposed.

8 Drums General Trash (Plastic and wood debris)

This material will be properly disposed.

9 Drums Oil Absorbent Material. (Clay)

When operating RMI-SP used oil absorbent clay in various locations around machinery to absorb spilled oil. This drum contained used clay absorbent which had been discarded. The material will be properly disposed.

4-3 OEPA COMMENT: Two 55 gal. unlabelled drums with yellow crystalline material with an oil odor outside salt dissolving building.

RMI RESPONSE: This material is oil contaminated salt (NaCl)

from the salt production area of the facility. The material was generated from a gear box pit which leaked gear oil onto the surrounding salt making the salt unusable as product. The contaminated salt has been properly disposed.

4-4 OEPA COMMENT: One 55 gal. unlabelled drum outside of garage.

RMI RESPONSE: This drum receives only waste oil from the maintenance garage. The barrel has been moved inside of the maintenance garage and is labeled "WASTE OIL ONLY" and "CONTAINS PETROLEUM HYDROCARBONS".

4-B OEPA COMMENT: Salt bathes which have already been dismantled are now being stored outside. The mortar-like material on the bathes and which has fallen onto the ground must be analyzed for barium content.

RMI RESPONSE: During normal production, as a production cell was taken out of service the cell shells were washed and placed in outside storage. The mortar material noted is a high temperature refractory mortar that acts as the bottom insulator of a production cell. During the inspection it was noted that a certain amount of mortar remained on the cell shells in outside storage.

Each cell shell which contained this mortar has been individually sampled and sent for analysis of TCLP metals by TCLP. The mortar material has been removed from each cell shell and drummed separately pending the results of the analytical testing.

4-C OEPA COMMENT: The grey-white crystalline material outside the

door of the salt dissolving building.

RMI RESPONSE: This material is floor sweepings from the salt dissolver area . This material through visual inspection contained; salt (NaCl), dirt and iron debris. Floor sweepings are routinely generated in this sodium chloride processing area. There are no hazardous constituents present. The floor sweepings were disposed of properly.

4-D OEPA COMMENT: Outside the cell bath building a tea-colored liquid has gathered in depressions.

RMI RESPONSE: This tea-colored liquid was found to be from an electrical sump pit in the area. This sump is routinely pumped to avoid water damage to the electrical equipment in the pit. During a recent maintenance cleaning operation a small amount of this moderately basic liquid was allowed to flow onto the ground. Normally this material is discharged into the plants wastewater system. The area of this spill has been cleaned. Per your request, sample of this material was collected from the sump on 10/6/92 and is being analyzed for TCLP metals by the TCLP method.

5 Accumulation Time of Hazardous Waste

5-A OEPA COMMENT: Forty-three drums labeled D005 with the date February 11, 1992 were found.

RMI RESPONSE: During production the RMI-SP operated up to 100 Downs electrolytic cells for the production of sodium and chlorine. The cells were rebuilt from time to time on an as-needed basis (average life of about two years). Also, the number of cells in

operation varied from year to year based on the sodium market. When a cell was taken out of service the molten pure salt mixture was poured into steel drums where it solidified into a monolithic block. This non-waste salt was then stored until it was reused in another production cell.

In 1991 the RMI-SP began the experimental use of barium cells to increase productivity. These cells contained a higher concentration of barium chloride than the usual calcium cells. On February 11, 1992 the RMI-SP ceased operation of the Downs cells, and all stored cell bath from the barium cells was declared a hazardous waste and labelled with accumulation starting that date. Since the stop of production 404 barium cell bath drums were processed through the south chute. The 43 drums of cell bath discovered during the August 17, 1992 Ohio EPA inspection were inadvertently missed during the processing of cell bath at the time. Upon discovery RMI-SP immediately began processing the 43 drums for disposal. The barium cell bath was shipped to a permitted hazardous waste disposal facility on August 20, 1992. Calcium bath which is readily dissolvable and marketed for other uses of the salt is not a waste.

Visual inspections of the 43 drums showed that all the containers were in excellent condition. Due to the integrity of the containers and the monolithic solid form of the drummed material no contamination of the storage area was observed or for that matter, could have occurred.

6) Labeling, Accumulation Time of Hazardous Waste

6-A OEPA COMMENT: In the tow-motor warehouse, materials which had been used in painting have been collected.

RMI RESPONSE: Portions of the RMI-SP are still in production and therefore paint and related materials are needed for maintaining this equipment. The area will be cleaned of any unusable material and unusable material will be properly disposed.

6-B OEPA COMMENT: The following drums must be properly labelled:

1. drum containing waste oil with a funnel at opening.
2. sodium sludge drums near incinerator

RMI RESPONSE:

1. While RMI-SP recognizes that this material is non-hazardous the importance of proper labeling is understood. This barrel has been labelled with the following labels:

"WASTE OIL ONLY" and "CONTAINS PETROLEUM HYDROCARBONS" (this is the same drum referred to in OEPA comment 4-4)

2. The sludge drums located near the thermal treatment unit have been treated in the unit.

OTHER CONCERNS

1 OEPA COMMENT: Three containers of previously burned material were located in or near the thermal treatment unit.

RMI RESPONSE: The containers used to collect oxides from the RMI-SP thermal treatment unit are used for a number of burns until they are filled. The oxides which contain no hazardous waste are cleaned by washing. The three scows of oxides have been cleaned.

2 OEPA COMMENT: The names and numbers of emergency coordinators must be continually updated.

RMI RESPONSE: The emergency and crisis call list was last revised on April 29, 1992. The only change to this list is a change of the Alternate Officer. The call list is being revised to reflect this change.

3 OEPA COMMENT: OEPA recommend that the security guards be trained on the RMI-SP contingency plan.

RMI RESPONSE: A training program and schedule is being written and the RMI-SP security staff will be trained on the plants contingency plan. The training will be conducted in the month of November.

4 OEPA COMMENT: Oil has been spilled near the number 6 oil tank.

RMI RESPONSE: A small amount of oil was spilled onto the concrete ramp area of the #6 oil tank. The spill occurred while collecting samples from the tank. The spill was confined to the concrete ramp with oil absorbent. The area has been cleaned and the material properly disposed.

5 OEPA COMMENT: A number of unlabelled drums were found during the inspection.

RMI RESPONSE: The RMI-SP has obtained durable colored drum tags to be used on drummed material. A program to improve drum labelling is being implemented as part of the ongoing hazard communication labelling program.

RMI TITANIUM COMPANY - SODIUM PLANT

SUPPLEMENTAL RCRA TRAINING

RCRA LOGS AND L.D.R.

I. Review of RMI-SP RCRA logs.

- A. Equipment Inspection Schedule Form
- B. Hazardous Waste Pile Inspection Form
- C. Hazardous Waste Burning Room Inspection Form

II. Review each log and it's importance to the Part B permit.

- A. All logs must be completely filled in.
- B. Items not in use should be so noted.
- C. Items no longer applicable should be marked - N/A
- D. Any unacceptable item should be so noted and corrected promptly.
- E. Inspections of all units must continue until unit is closed.
- F. Introduce and review the revised " Hazardous Waste Burning Room Inspection Form".

III. Manifests and Land Band Forms.

- A. Review the proper completion of Manifest and Land Ban Forms.
- B. Stress the importance of proper completion and review the proper filing procedures of these forms.



SODIUM PLANT
STATE ROAD & EAST 6TH STREET
P.O. BOX 550
ASHTABULA, OHIO 44004-0550
216/997-5141
FAX 216/992-7036

RCRA Follow up TRAINING

Sign up Sheet
TRAINER D.R. MICKY

10/22/92

TIME 0830 DATE 10/22/92

NAME SIGNATURE

OCCUPATION

GARY L. STEVENS

Gary L. Stevens

SUPERVISOR

DOUGLAS P. KORB

Douglas P. Korb

PLANT MANAGER

Time 1145 DATE 10/22/92

NAME SIGNATURE

OCCUPATION

ROBERT HOWE

Robert Howe

SUPERVISOR

EXHIBIT F-4. Hazardous Waste Burning Room Inspection Form (Daily - when in use.)

ATTACHMENT #2

AREA _____

DATE AND TIME _____

INSPECTOR'S NAME _____

REVIEWED BY: _____
Manager, Sodium ProductionAUDITED BY: _____
Project Engineer

("Reviewed By" is not applicable if Manager, Sodium Production performs inspection.)

INSPECTION ITEM	POTENTIAL PROBLEMS	STATUS (Acceptable or Unacceptable)	REMARKS OR OBSERVATIONS	REMEDIAL ACTIONS NECESSARY	DATE REMEDIAL ACTIONS PERFORMED
Adequate Aisle Space	Non-Waste materials stored in Storage Area.				
Broom and Shovel in Wash Tank Area	Equipment absent or nonfunctional.				
Brooms and Shovels in Day Service Area	Equipment absent or nonfunctional.				
Burning Room and Storage Area	General damage; cracks, uneven settlement or erosion of floor or walls, fit and oper- ation of doors.				

EXHIBIT F-4. Hazardous Waste Burning Room Inspection Form (Daily - when in use.)

(continued)

INSPECTION ITEM	POTENTIAL PROBLEMS	STATUS (Acceptable or Unacceptable)	REMARKS OR OBSERVATIONS	REMEDIAL ACTIONS NECESSARY	DATE REMEDIAL ACTIONS PERFORMED
Unacceptable Material	Presence of containers of garbage or refuse in Burning Room or Storage Area; presence of nonwaste containers; presence of equipment or materials that are not supposed to be in the area.				
Monorail, Cart & Tracks	Mechanical deficiencies in hoist, loose bolts, worn or damaged flanges, cart tilting mechanism.				
Fan, Air Quality Control Equipment	Bearings need replacing, fan unbalanced, lack of water to scrubber, mal- functioning instrumenta- tion, malfunctioning valves, corrosion or deterioration.				
Torches, Burning Utensils	Bent or damaged torches or utensils, clogged torch head, leaking or damaged hoses.				
Condition of Containers & Pallets	Damaged or leaking drums. Damaged pallets. Greater than three pallets in storage area.				

EXHIBIT F-4. Hazardous Waste Burning Room Inspection Form (Daily - when in use.)

(continued)

INSPECTION ITEM	POTENTIAL PROBLEMS	STATUS (Acceptable or Unacceptable)	REMARKS OR OBSERVATIONS	REMEDIAL ACTIONS NECESSARY	DATE REMEDIAL ACTIONS PERFORMED
Fire Extinguisher in the Burning Room & outside Burning Room	Extinguisher missing from area or damaged In need of recharging difficult to access				
*Hazardous waste drum satellite accumulation point at monitoring Well #2-S (S.E. corner of old landfill) *Weekly inspection	Label missing, label illegible, improperly labeled. Drum leaking, corroded, lid missing or unbolted.				
=====					

EXHIBIT F-4 Hazardous Waste Burning Room Inspection Form (Daily - when in use.)

AREA _____

Revised 10/23/92

DATE AND TIME _____

ATTACHMENT #3

INSPECTOR'S NAME _____

REVIEWED BY: _____

Manager, Sodium Production

AUDITED BY: _____

Project Engineer

("Reviewed By" is not applicable if Manager, Sodium Production performs inspection.)

INSPECTION ITEM	POTENTIAL PROBLEMS	STATUS (Acceptable or Unacceptable)	REMARKS OR OBSERVATIONS	REMEDIAL ACTIONS NECESSARY	DATE REMEDIAL ACTIONS PERFORMED
Adequate Aisle Space & Drum Storage Area	Non-Waste materials stored in Storage Area.				
Brooms and Shovels in Wash Tank	Equipment absent or nonfunctional				
Brooms and Shovels in Day Service Area	Equipment absent or Nonfunctional.				
Burning Room and drum Storage Area	General damage; cracks, uneven settlement or erosion of floor or wall, fit and operation of doors.				

EXHIBIT F-4 Hazardous Waste Burning Room Inspection Form (Daily - when in use.)

(continued)

Revised 10/23/92

INSPECTION ITEM	POTENTIAL PROBLEMS	STATUS (Acceptable or Unacceptable)	REMARKS OR OBSERVATIONS	REMEDIAL ACTIONS NECESSARY	DATE
					REMEDIAL ACTIONS PERFORMED
Unacceptable Material	Presence of containers of garbage or refuse in Burning Room or Storage Area; presence of nonwaste containers; presence of equipment or materials that are not supposed to be in the area.				
Monorail, Cart & Tracks	Mechanical deficiencies in hoist, loose bolts, worn and damaged flanges, cart tilting mechanism.				
Fan, Air Quality Control Equipment	Bearings need replacing, fan unbalanced, lack of water to scrubber, Mal- functioning instrumenta- tion, malfunctioning valves, corrosion or deterioration.				
Torches, Burning Utensils	Bent or damaged torches or utensils, clogged torch head, leaking or damaged hoses.				
Condition of Containers & Pallets - in Drum Storage Area	Damaged or leaking drums. Damaged pallets. Grater than three pallets in storage area.				